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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON

18 CV-01708

RSL-MAT

Avery C. Williams
(Name of Plaintiff)

vs.

CIVIL RIGHTS COMPLAINT
BY A PRISONER UNDER 42
U.S.C. § 1983

KCJ medical staff
Roger Higgs, Monica manley
William danforth
Wayne Webster, radostina Decheva
(Names of Defendant(s))

I. Previous Lawsuits:

A. Have you brought any other lawsuits in any federal court in the United States while a prisoner?:

☐ Yes

☒ No

B. If your answer to A is yes, how many?: 0. Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff: NA

Defendants: NA

2. Court (give name of District): NA

3. Docket Number: NA

4. Name of judge to whom case was assigned: _____

5. Disposition (For example: Was the case dismissed as frivolous or for failure to state a claim? Was it appealed? Is it still pending?):

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

II. Place of Present Confinement:

King County Jail 500 5th Ave

A. Is there a prisoner grievance procedure available at this institution? ☒ Yes ☐ No

B. Have you filed any grievances concerning the *facts* relating to this complaint?
☒ Yes ☐ No

If your answer is NO, explain why not:

C. Is the grievance process completed? ☒ Yes ☐ No

If your answer is YES, ATTACH A COPY OF THE FINAL GRIEVANCE RESOLUTION for any grievance concerning facts relating to this case.

III. Parties to this Complaint

A. Name of Plaintiff: Avery C. Williams Inmate No.: 218015380

Address: 500 5th Ave Seattle WA 98104

(In Item B below, place the full name of the defendant, his/her official position, and his/her place of employment. Use item C for the names, positions and places of employment of any additional defendants. Attach additional sheets if necessary.)

B. Defendant: William Danforth Official Position: ARNP

Place of employment: King County Jail 500 5th Ave Seattle

C. Additional defendants medical staff that done my
wound care, Nellie Oshannes RN, omer Behauden RN, brandi
smith RN, mary pat sweetman RN, RADOSTINA DE CHEVA RN
(MONICA Manley RN very poor medical,) Carolyn Clark

These are staff that were involved as well
Wayne Webster, Roger Higgs, Radostina Decheva

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates, places, and other persons involved. Do not give any legal arguments or cite any cases or statutes. If you allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets if necessary.)

On or about 7-5-18 William Danforth ARNP I told him that my left hip felt like it was on fire, and that I believe that I have a infection plus the fact that my leg was hurting a whole lot and that I need pain meds I was telling him that it has been bleeding and smells bad plus has been running green drainage out of wound on a daily basis for about a week. The nurse staff did not complete wound documentation forms as the space available ask they didn't fill out form properly. It also took them weeks to get me a egg crate plus extra blanket to put on the bed for me to lay on so there don't be any damage to muscle tissue or leg from having to sleep on one side.

I suffered lots of pain through out the day and night plus couldn't put pressure on leg do to the pain it cause me (left leg). I was given pain meds that kind of help and kept getting taken off of them for no reason. Staff would not listen to me when it came to me trying to address the pain I was in nor to clean wound properly.

There was lots of times when nurse staff did not call me out to clean my wounds at all. I feel that I suffer serious neglect to a serious medical need.

In August I was sent out to Western State in which I got great care they discover that I had a infection and suffer from MRSA. They give me pain meds right away 4x a day. The Western State med team also got me sent out to see Francisco Wound Care.

V. Relief

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

IV. Statement of Claim

center 1802 S. Yakima. Suite 104 / 208 Tacoma WA 98405. There I was given a pico vac in which it was use to take out the fluid in my left leg around the hip area the front, side, and behind my leg was full of fluid which also causing pain.

The Jail medical has been grossly indifferent to serious medical needs. MR William danforth ARNP did not do his job at all. He kept me in very painful situations and also had his staff do the same. unnecessary and wanton infliction of pain was created.

Roger higgs MD also did not allow me the proper help nor did Wayne webster MD, mr Wayne webster would only give pain meds for a day or so even though they could see I was in lots of unwanted pain.

There was a lot of cruel pain and punishment. King county medical deprive me the equal rights as every one else that is incarcerated in the King county Jail.

I was given wrong meds by MD Rogers higgs, I was deprive the right to have my (pg 2)

on meds my doctor gave me be given to me. MD Rogers played with my med dose and could've cost me my life every seizure is serious and him telling me he's done this for 40ty years makes me think that he done these things to me intentionally and gave me PTSD.

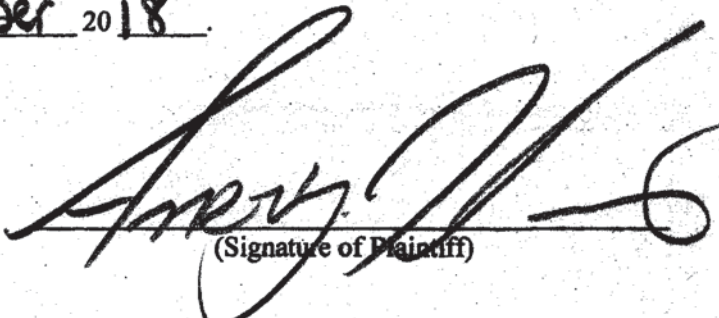
I've suffered lots of pain during this stay here at King County Jail. in which never should've happen lack of help as well plus made me Nervous, affraid, scared of staff here at the Jail like they want to kill me

I Never have told staff that I was not in pain. I stay in pain and till this day I expirence pain just not as great as I use to.

There should be a penalty that allows me to be compensated for every day that I had to go through cruel punishment and medical neglect pain and suffering please mental anguish went (PTSD) being scared, nervous, and afraid. I'm going to ask for 1,000⁰⁰ dollars a day for at least 100-90 days for sure.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 22 day of November 2018.


(Signature of Plaintiff)

Avery Williams 218015380
King County Jail
500 5th Ave
Seattle WA 98104

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BY WESTERN DISTRICT OF WASHINGTON
C. PERRY

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